

EXHIBIT B
TO THE DECLARATION OF
CHRISTOPHER O. GREEN IN SUPPORT OF
APPLE'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL (DKT. No. 416)
UNREDACTED

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23 -- HIGHLY CONFIDENTIAL ATTORNEYS EYES ONLY --

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8 VIDEOTAPED DEPOSITION OF EDWIN WONG

9 Volume I

10 Taken on behalf of Defendant Apple, Inc. at
11 McCorriston, Miller, Mukai, MacKinnon, LLP, Five
12 Waterfront Plaza, 4th Floor, 500 Ala Moana
13 Boulevard, Honolulu, Hawaii 96813, commencing at
14 9:15 a.m. on October 24, 2013, pursuant to
15 Individual Notice and 30(b)(6) Notice.

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24 Before: WILLIAM T. BARTON, RPR, CSR NO. 391
25 Notary Public, State of Hawaii

1 in the field of wire line and wireless data
2 communications; the company generates revenues by
3 licensing its patents or enforcing against
4 companies that infringe upon its patents"?

5 Do you see that statement?

6 A. Yes.

7 Q. What was GPNE's research and development
8 budget in 2009?

9 A. Research and development budget in --
10 what's the date of this? 2009. What was our
11 budget? I don't recall.

12 Q. What was GPNE's research and development
13 budget in the year 2010?

14 A. I don't recall.

15 Q. What was -- for the years between 2009
16 and present day can you tell me what GPNE's
17 research and development budget was at any point
18 in that period?

19 A. I don't remember things in terms of
20 budget. I mean, I just remember things in terms
21 of activity. Like what we did with the
22 simulations and things like that.

23 Q. You're the Chief Executive Officer of
24 GPNE, correct?

25 A. Yes.

1 Q. So as the Chief Executive Officer can
2 you tell me how much money GPNE budgeted for
3 research and development in any of the years
4 between 2009 and present day?

5 MR. SUSSEY: Objection. Asked and
6 answered.

7 A. I just don't remember budgets.

8 Q. What is your best recollection?

9 A. I don't have a recollection. I just --
10 we just do it. Back then it was just do it.

11 Q. Does GPNE have any income other than
12 money it makes from licensing and litigating its
13 patent portfolio?

14 A. No.

15 Q. In the year 2009 did GPNE have any
16 income other than money it made from litigating
17 its patent portfolio?

18 A. No.

19 Q. When was the last time that GPNE earned
20 any revenue from an activity other than litigating
21 its patent portfolio?

22 A. It hasn't earned anything from --

23 Q. All right. Thank you. Let's take that
24 bathroom break.

25 THE VIDEOGRAPHER: We're going off the

1 record at 11:54 a.m.

2 (Whereupon, a recess was taken from
3 11:54 a.m. to 12:13 p.m.)

4 (Whereupon, a spreadsheet was marked as
5 Exhibit 7 for Identification.)

6 THE VIDEOGRAPHER: We're back on the
7 record at 12:13 p.m.

8 Q. Mr. Wong, I will hand you what the
9 reporter has marked as Exhibit 7. This is a
10 document bearing production number GPNE-APP
11 00021313. And it's entitled, "GPNE Corp. as of
12 November 20, 2012." And it appears to be a list
13 of shareholders.

14 Do you recognize this document, Exhibit
15 7, Mr. Wong?

16 A. Yes.

17 Q. Does the document marked as Exhibit 7
18 correctly reflect GPNE's current shareholders and
19 their respective ownership interest in GPNE?

20 A. Yes. I believe so.

21 Q. Is that also true for Ernest Bodner who
22 I understand recently terminated his employment
23 with GPNE?

24 A. Yes.

25 Q. Is GPNE required to make any disclosures

1 It's not -- I don't base it on a study.

2 It's just common sense, I guess.

3 Q. All right. How many different
4 technology standards are implemented in an iPhone?

5 A. I apologize, I'm not trying to laugh at
6 you. Sometimes it just sounded so funny. Anyway.
7 It has nothing to do with you.

8 Q. I'll ask my question again, sir.

9 A. Go ahead.

10 Q. How many different technology standards
11 are implemented in an iPhone?

12 A. How many technology standards are in an
13 iPhone? I don't know.

14 Q. How many different technology standards
15 are implemented in an iPad?

16 A. I don't know.

17 Q. Are you able to define for me any
18 methodology for valuing one technology standard
19 over another technology standard?

20 A. I guess if something has a central
21 function it's going to be worth more than
22 something that's not.

23 Q. Sir, that's not my question. I'm asking
24 if you can identify for me any methodology for
25 valuing one technology standard over another

1 technology standard?

2 MR. SUSSER: Objection. Asked and
3 answered.

4 A. Yeah, I mean intuitively that's what I
5 would think, what I just said previously.

6 Q. I'm going to repeat the question, sir,
7 because I don't think you're answering it. Maybe
8 we're not speaking to each other.

9 I'm asking if you can identify any
10 methodology such as any economic theory for
11 valuing one technology standard over another one?

12 A. I'm not an expert.

13 Q. Is that a no? You're not aware of any
14 such methodology or economic standard for valuing
15 differing technology standards?

16 A. Yeah, I rely on my attorneys and their
17 experts to figure it out. Other than the common
18 sense answer I gave you earlier, that's all I have
19 for you now.

20 Q. All right. How many letters -- strike
21 that.

22 How many companies has GPNE sent
23 licensing letters to?

24 A. I think a few hundred.

25 Q. What do you mean by "a few hundred"?

1 More than two hundred?

2 A. I don't know the exact number. I just
3 think it's around a few hundred.

4 Q. As you sit here today can you give me --
5 strike that.

6 As you sit here today what is your best
7 understanding of the number of companies GPNE has
8 approached for the purpose of offering a license
9 to the GPNE patent portfolio?

10 A. Number of people that we've approached.
11 Sorry. Could you repeat that.

12 (Record read by the Court Reporter.)

13 A. It's the same answer. I just know it's
14 ballpark of 300.

15 Q. Who would know for sure?

16 A. Well, we hired a licensing firm, GSP,
17 George Street Partners. They are the ones in
18 charge of it. So they would know for sure.

19 Q. Why did GPNE hire George Street Partners
20 -- strike that.

21 When did GPNE hire George Street
22 Partners?

23 A. The earlier part of this year I think.

24 Q. Earlier part of 2013?

25 A. That's correct.